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v.

Defendant.

TREVOR HURD,

aka "C-Mac,"

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FILED

CLERK, U.S. DISTRICT COURT

10/4/2023

CENTRAL DISTRICT OF CALIFORNIA

BY: ______ DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2022 Grand Jury

UNITED STATES OF AMERICA, CR No.2:23-cr-00488-DSF

Plaintiff, $\underline{I} \ \underline{N} \ \underline{D} \ \underline{I} \ \underline{C} \ \underline{T} \ \underline{M} \ \underline{E} \ \underline{N} \ \underline{T}$

[18 U.S.C. § 922(g)(1): Felon in Possession of Ammunition; 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c): Criminal Forfeiture

The Grand Jury charges:

[18 U.S.C. § 922(g)(1)]

On or about September 3, 2023, in Los Angeles County, within the Central District of California, defendant TREVOR HURD, also known as "C-Mac," knowingly possessed ammunition, namely, ten rounds of Norma Precision AB 9mm Luger caliber ammunition contained inside a semi-automatic handgun bearing no serial number (commonly referred to as a "ghost gun"), each in and affecting interstate commerce.

Defendant HURD possessed such ammunition knowing that he had previously been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

- 1. Felon in Possession of a Firearm, in violation of California Penal Code Section 29800(a)(1), in the Superior Court for the State of California, County of Los Angeles, Case Number VA157809, on or about July 27, 2022;
- 2. Felon in Possession of a Firearm, in violation of California Penal Code Section 29800(a)(1), in the Superior Court for the State of California, County of Los Angeles, Case Number BA494471, on or about October 12, 2021;
- 3. Attempted Second Degree Robbery, in violation of California Penal Code Sections 664 and 211, in the Superior Court for the State of California, County of Los Angeles, Case Number BA462274, on or about November 8, 2017;
- 4. Grand Theft, in violation of California Penal Code Section 487(a), in the Superior Court for the State of California, County of Los Angeles, Case Number BA437717, on or about August 12, 2015; and
- 5. Transportation and Sale of a Controlled Substance, in violation of California Health and Safety Code Section 11352(a), in the Superior Court for the State of California, County of Los Angeles, Case Number BA430435, on or about October 20, 2014.

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FORFEITURE ALLEGATION

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

- 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of defendant's conviction of the offense set forth in the Indictment.
- 2. The defendant, if so convicted, shall forfeit to the United States of America the following:
- (a) All right, title, and interest in any firearm or ammunition involved in or used in such offense; and
- (b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).
- 3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof

 (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

substantially diminished in value; or (e) has been commingled with 1 2 other property that cannot be divided without difficulty. 3 A TRUE BILL 4 /s/ 5 Foreperson 6 7 E. MARTIN ESTRADA United States Attorney 8 MACK E. JENKINS 9 Assistant United States Attorney Chief, Criminal Division 10 11 12 SCOTT M. GARRINGER Assistant United States Attorney 13 Deputy Chief, Criminal Division 14 IAN V. YANNIELLO Assistant United States Attorney 15 Deputy Chief, General Crimes Section 16 SARAH S. LEE 17 Assistant United States Attorney General Crimes Section 18 19 20 21 22 23 24 25 26 27

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